

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No. 0:23-cv-60609-RS

PASTA E MARE CO., a Florida Profit Corporation,  
and ARMANDO MANTILLA, an individual,

Plaintiffs,

v.

POMPANO BEACH CLUB RECREATION  
CENTER, INC., a Florida Not-for-Profit Corporation,  
JEANNINE LESBURT, an individual, RONALD  
RITTER, an individual, PAMELA TOBIAS, an  
individual, and EDITH "JAN" IGNOZZI, an  
individual,

Defendants,

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**MOTION FOR RELIEF FROM PAGE LIMITATIONS**

Defendants, POMPANO BEACH CLUB RECREATION CENTER, INC., JEANNINE LESBURT, RONALD RITTER, PAMELA TOBIAS, and EDITH "JAN" IGNOZZI, hereby file this Motion for Relief from Page Limitations, and in support thereof, state as follows:

1. Pursuant to this Honorable Court's procedures and Local Federal Rule 7.1(c)(2), "[a]bsent prior permission of the Court, neither a motion and its incorporated memorandum of law nor the opposing memorandum of law shall exceed twenty (20) pages." *Id.*
2. The Complaint is forty-four (44) pages long and includes 245 paragraphs.
3. Plaintiffs have asserted fifteen (15) causes of action in their Complaint.
4. The Complaint involves numerous parties: two (2) different Plaintiffs (a corporate Plaintiff and individual Plaintiff) and five (5) Defendants.

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5. Rather than submitting various responses to the Complaint in piecemeal, the five (5) Defendants have completed and wish to submit one (1) response to the Complaint on behalf of *all* Defendants. This response is forty (40) pages total.

6. Given the length of the Plaintiffs' Complaint (44 pages, 245 paragraphs), the number of different causes of action asserted (fifteen (15) total), and the number of parties in this case (two Plaintiffs and five Defendants), the Defendants require twenty (20) additional pages to appropriately respond to all of the allegations and causes of action in Plaintiffs' Complaint and ensure that no defenses are waived.

7. This Motion is made in good faith and to preserve judicial economy and resources.

8. Indeed, it will be more effective and streamlined for the Parties and this Court if Defendants are permitted to submit one (1) response to the Complaint, as opposed to numerous shorter responses on behalf of each of the five (5) different Defendants individually.

9. Defendants' counsel conferred with the Plaintiffs' counsel prior to filing this Motion (on May 11, 2023), who indicated he is not opposed to the relief sought.

WHEREFORE, Defendants, POMPAÑO BEACH CLUB RECREATION CENTER, INC. JEANNINE LESBURT, RONALD RITTER, PAMELA TOBIAS, and EDITH "JAN" IGNOZZI, respectfully request this Honorable Court enter an Order<sup>1</sup> granting this Motion, providing Defendants with relief from the page limitations, allowing the Defendants to submit one response to the Complaint totaling forty (40) pages on behalf of all Defendants, along with any other relief this Court deems just and proper in light of the foregoing.

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<sup>1</sup> A proposed Order granting this Motion has been included as Exhibit "1" to this Motion and has been sent to this Honorable Court via email as required under the local procedures.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed this 16th day of May 2023 with the Clerk of Court using CM/ECF which will send electronic copies of same to all counsel of record.

COLE, SCOTT & KISSANE, P.A.  
*Counsel for Defendants*  
110 Tower  
110 S.E. 6th Street, Suite 2700  
Fort Lauderdale, Florida 33301  
Telephone (954) 703-3708  
Facsimile (954) 703-3701  
Primary e-mail: craig.minko@csklegal.com  
Primary e-mail: diana.rafael@csklegal.com  
Secondary e-mail: melissa.botero@csklegal.com  
Secondary e-mail: nikole.noble@csklegal.com

By: s/Craig Minko  
Craig Minko  
Florida Bar No.: 84499  
Diana E. Rafael  
Florida Bar No.: 1010306